UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	\

IN RE TERRORIST ATTACKS ON **SEPTEMBER 11, 2001**

Civil Action No. 03 MDL 1570 (RCC)

This document relates to:

Thomas E. Burnett, Sr., et al. vs. Al Baraka Investment and Development Corp., et al., Case No. 03-CV-5738, 03-CV-9849 (S.D.N.Y.)

Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-7279 (S.D.N.Y.)

World Trade Center Properties, et al. v. Al Baraka Investment and Development Corp, et al., Case No. 04-CV-7280 (S.D.N.Y.)

PLAINTIFFS' MORE DEFINITE STATEMENT AS TO **DEFENDANT GLOBAL RELIEF FOUNDATION**

Counsel for the above-captioned Plaintiffs hereby provide a more definite statement as to Defendant Global Relief Foundation. This statement, annexed hereto as Exhibit 1, is hereby incorporated into the consolidated Complaints pursuant to the Court's Case Management Order No. 1, dated March 10, 2004, and Case Management Order No. 2, dated June 16, 2004, paragraph 13.

Respectfully submitted, Dated: September 27, 2005

Michael E. Elsner, Esq. (NY - ME8337; VA-41424; SC-72893)

Ronald L. Motley, Esq. (SC-4123)

Jodi Westbrook Flowers, Esq. (SC-66300)

Donald A. Migliori, Esq. (RI-4936; MA-567562; MN-0245951)

Robert T. Haefele, Esq. (NJ-58293; PA-57937)

Justin B. Kaplan, Esq. (TN-022145)

John Eubanks (MD)

MOTLEY RICE LLC

28 Bridgeside Boulevard

P.O. Box 1792

Mount Pleasant, South Carolina 29465

Telephone: (843) 216-9000

Jayne Conroy, Esq. (NY-JC8611)
Paul J. Hanly, Jr., Esq. (NY-PH5486)
Andrea Bierstein, Esq. (NY-AB4618)
HANLY CONROY BIERSTEIN
& SHERIDAN, LLP
112 Madison Avenue, 7th Floor
New York, NY 10016-7416
Tel: (212) 784-6400

Attorneys for Plaintiffs